

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re:	PROMESA
	Title III
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	No. 17 BK 3283-LTS
as representative of	(Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO, <i>et</i> <i>al.</i> ,	
Debtors. ¹	

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**EIGHTH SUPPLEMENTAL JOINT STATUS REPORT OF MOVANTS AMERICAN
FEDERATION OF STATE, COUNTY AND MUNICIPAL EMPLOYEES, AFL-CIO,
AMERICAN FEDERATION OF TEACHERS, AFL-CIO, INTERNATIONAL UNION,
AND SERVICE EMPLOYEES INTERNATIONAL UNION AND RESPONDENTS
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO AND
PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY AUTHORITY WITH
RESPECT TO THE JOINT MOTION FOR ENTRY OF AN ORDER AUTHORIZING
DISCOVERY UNDER BANKRUPTCY RULE 2004**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States Magistrate Judge Judith Gail Dein:

Movants American Federation of State, County and Municipal Employees International Union, AFL-CIO (AFSCME), American Federation of Teachers, AFL-CIO (AFT), and Service Employees International Union (SEIU), on behalf of themselves, their local affiliates in Puerto Rico and their members (collectively, the “Unions”),¹ and the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), the Commonwealth of Puerto Rico (the “Commonwealth”), by and through the Oversight Board as the Commonwealth’s representative pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”),² and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF” and together with the Oversight Board and the Commonwealth, the “Respondents”),³ respectfully submit this eighth supplemental joint status report in response (1) to the Court’s March 19, 2018 Order Related to the Unions’ Joint Motion for an Order Authorizing Discovery Under Bankruptcy Rule 2004 (the “March 19 Order”) [ECF No. 2768] and (2) to supplement the Parties’ prior supplemental joint status report filed on August 10, 2018 (the “Report”) [ECF No. 3758]. The March 19 Order requests that the Parties meet and confer regarding a revised hearing date and proposed briefing schedule in connection with the Unions’ Joint Motion for an Order Authorizing Discovery Under Bankruptcy Rule 2004 (the “Motion”). Subsequent to entry of the March 19 Order, the Parties: (1) met and conferred; (2) filed an initial joint status report on March 22, 2018 in accordance with the March 19, 2018 Order; (3) filed a supplemental joint status on March 28, 2018; (4) filed a second supplemental joint status report

¹ International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, AFL-CIO (UAW) was a party to the Unions’ Motion (as defined herein) but has formally withdrawn from the Motion [D.I. 2914].

² PROMESA has been codified in 48 U.S.C. §§ 2101–2241.

³ The Movants and Respondents are collectively referred to as the “Parties.”

on April 13, 2018; (5) filed a third supplemental joint status report on April 27, 2018; (6) filed a fourth supplemental joint status report on May 16, 2018; (7) filed a fifth supplemental joint status report on June 7, 2018; (8) filed a sixth supplemental joint status report on July 6, 2018 and (9) filed the Report (which amended the July 6, 2018 supplemental joint status report).

Pursuant to the March 19 Order and as set forth in the Report, the Parties hereby supplement the Report as follows:

1. Hearing Date – The Parties continue to meet and confer in regard to the Motion and at this time the parties do not request a hearing on the Motion.
2. Meet and Confer – As noted in the Report, the Parties negotiated the terms of a protective order which was approved by the Court on April 20, 2018 [D.I. 2931]. Additionally, Respondents have provided certain information requested by the Unions and the Parties are continuing discussions regarding the production of additional information.
3. Briefing Schedule – In the event the Parties cannot resolve the Motion, the Parties shall further supplement this Report by no later than October 30, 2018. The further supplemental report may include a proposed briefing schedule and a request for a hearing date.

Dated: September 19, 2018

By: /s/ Judith E. Rivlin

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